

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA, :
: Plaintiff, :
: :
v. : : Criminal Action No. 05-99-SLR
: :
ROBERT URQUHART, :
: :
Defendant. :
:

MOTION FOR CONTINUANCE OF SENTENCING

Defendant, Robert Urquhart, by and through his undersigned counsel, Eleni Kousoulis, hereby moves the Court for an Order continuing the sentencing hearing in this case.

In support of this motion, the defense submits as follows:

1. Mr. Urquhart is scheduled for sentencing on November 28, 2007 at 4:30 p.m.
2. The U.S. Sentencing Commission is issuing new Guidelines on November 1, 2007,

which will directly affect Mr. Urquhart's sentence.

3. The initial draft of the Presentence Report (PSR) is due to the parties by the end of October 2007. However, the U.S. Probation Office would like to wait until the new Guidelines are released before sending out the initial draft of the PSR, so that the PSR can properly reflect and incorporate the changes to the Guidelines.

4. Defense counsel respectfully requests that Mr. Urquhart's sentencing be continued for 30-45 days to allow the U.S. Probation Office the opportunity, once the new Guidelines are released in November, to complete its preparation of the PSR. Furthermore, this will allow the parties

adequate time to review the initial draft of the PSR and make any objections or corrections to the report if necessary.

5. Assistant United States Attorney, Lesley Wolf, counsel for the government, has no objection to the defense's continuance request.

WHEREFORE, Mr. Urquhart respectfully requests that the Court continue the sentencing hearing in this matter to anytime after January 7, 2008.

Respectfully Submitted,

/s/
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DATED: October 19, 2007